

JAP: AEL
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 18, U.S.C., § 472)

KATHERINE VELEZ,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MAUREEN MURPHY, being duly sworn, deposes and says that she is a Special Agent with the United States Secret Service, duly appointed according to law and acting as such.

Upon information and belief, on or about May 8, 2012, within the Eastern District of New York, the defendant KATHERINE VELEZ, with intent to defraud, pass, utter, publish or sell, kept in her possession counterfeit obligations of the United States, to wit, 1,412 Federal Reserve Notes in \$100 denominations.

(Title 18, United States Code, Section 472).

The source of your deponent's information and the grounds for his belief are as follows:

1. On or about May 8, 2012, at approximately 6:00 a.m., the defendant KATHERINE VELEZ arrived at John F. Kennedy International Airport ("JFK") on Avianca Airlines, Flight No. 20, originating from Bogota, Colombia. Upon arrival, the defendant presented one U.S. passport and two pieces of luggage for

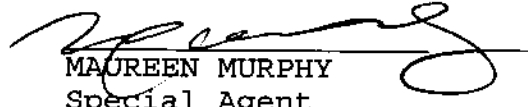
inspection. The defendant was selected for a secondary inspection by Customs and Border Protection ("CBP") officers.

2. During secondary inspection, a search of the defendant's luggage revealed 1,112 Federal Reserve Notes, in \$100 denominations, hidden beneath the lining of the defendant's black Explora Suitcase. Furthermore, 300 Federal Reserve Notes in \$100 denominations were found hidden inside the liner of a Zaragovia black Portfolio found inside the defendant's Explora suitcase. On closer inspection, the notes appeared to be counterfeit.

3. CBP notified the Department of Homeland Security and the Secret Service. I responded to the CBP inspection area of Terminal Four, located at JFK. I am trained in the examination and detection of counterfeit obligations of the United States, and I examined the above-described Federal Reserve Notes and determined that they were counterfeit.

4. After KATHERINE VELEZ was arrested and advised of her rights, the defendant stated, in substance and in part, that she borrowed the black Explora suitcase from her aunt, and that she didn't know there was counterfeit currency inside. When asked about the Zaragovia black portfolio, the defendant stated that she purchased it on the streets of Bogota, and that she did not know there was counterfeit currency inside the liner.

WHEREFORE, your deponent respectfully requests that the defendant KATHERINE VELEZ be dealt with according to law.


MAUREEN MURPHY
Special Agent
U.S. Secret Service

Sworn to before me this
8th day of May, 2012

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